

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FACTORY MUTUAL INSURANCE
COMPANY, as subrogee of Agilent
Technologies, Inc.,

Plaintiff,

v.

Case No. 2:25-cv-02424-TLP-tmp

XPEDIENT MANAGEMENT GROUP,
LLC and ST. PAUL FIRE AND MARINE
INSURANCE COMPANY,

JURY TRIAL DEMANDED

Defendants.

XPEDIENT MANAGEMENT GROUP, LLC'S
MOTION TO DISMISS

Defendant Xpedient Management Group, LLC ("Xpedient"), respectfully submits this motion to dismiss Plaintiff's Complaint [Doc. 1] pursuant to Federal Rule 12(b)(1) and 12(b)(6). In support, Xpedient relies on the following exhibits and its Memorandum of Authorities:

Exhibit 1-Agilent Technologies, Inc. Complaint Case No. 2:25-CV-02101-MSN-CGC

Exhibit 2—Xpedient Mgmt. Group, LLC Answer Case No. 2:25-CV-02101-MSN-CGC

WHEREFORE, Xpedient Management Group, LLC, respectfully requests Plaintiff's Complaint be dismissed.

THIS the 14th day of May 2025.

/s/ William P. Thomas

William P. Thomas (MS 102209)

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the Court's ECF system, which sent notification of such filing to all counsel of record.

/s/ William P. Thomas

William P. Thomas

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